

From: "Janice Bariola" <jbariola@deltabk.com> on 01/29/2004 04:10:45 PM
Subject: Truth in Lending

We urge the Board not to adopt the modification on consumer protection regulations' requirements on changing disclosure requirements. We feel that the new clear and conspicuous requirements for disclosures in Regulations B, E, M, Z and DD are unclear and might invite expensive lawsuits. It would also impose an expensive regulatory burden for redrafting and reproducing many if not all disclosures.

The revised disclosures may be less helpful to consumers. Consumers might be less likely to review the longer disclosures.

Janice Bariola
Vice President/Compliance Officer

jbariola@deltabk.com Delta Bank P.O. Box 511 406 Lake Street Lake Providence, LA
71254

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